

HOGAN LOVELLS US LLP
Erin N. Brady (CA 215038)
erin.brady@hoganlovells.com
1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

– and –

M. Hampton Foushee (*pro hac vice*)
hampton.foushee@hoganlovells.com
875 Third Avenue
New York, New York 10022
Tel: (212) 918-3000
Fax: (212) 918-3100

*Counsel for Party in Interest
esVolta, LP.*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
PG&E CORPORATION - and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19 - 30088 (DM)

Chapter 11

(Lead Case)
(Jointly Administered)

**NOTICE OF HEARING ON ESVOLTA, LP'S
(I) MOTION TO CONFIRM SAFE HARBOR
PROTECTION UNDER 11 U.S.C. §§ 362(b)(6)
AND 556; AND (II) MOTION TO FILE
UNDER SEAL**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Hearing Date: **April 10, 2019**
Time: **1:30 p.m.**
Courtroom: Hon. Dennis Montali
450 Golden Gate Avenue
16th Floor, Courtroom 17
San Francisco, CA 94102

Objections Due: **April 3, 2019, 4:00 p.m.**

1 **PLEASE TAKE NOTICE** that esVolta, LP (“esVolta”) has filed a motion to confirm
2 safe harbor protection under 11 U.S.C. §§ 362(b)(6) and 556 (the “Safe Harbor Motion” [Dkt.
3 977]), and a motion to file certain contracts and related filings under seal (the “Motion to File
4 Under Seal,” [Dkt. 974]), and together with the Safe Harbor Motion, the “Motions”).

5 **PLEASE TAKE FURTHER NOTICE** that the Motions are each based on the
6 Memorandum of Points and Authorities annexed thereto, respectively, the Declaration of
7 Randolph Mann filed in support of the Motions [Dkt. 979], the complete files and records of the
8 referenced matters, the arguments of counsel, and such other and further matters as this Court
9 may consider at or before any hearing on the Motions.

10 **PLEASE TAKE FURTHER NOTICE** that the Motions are set for hearing on **April 10,**
11 **2019 at 1:30 p.m. (PST)** before the Honorable Dennis Montali at the United States Bankruptcy
12 Court for the Northern District of California, San Francisco Division, located at 450 Golden
13 Gate Avenue, 16th Floor, Courtroom 17, San Francisco, CA 94102.

14 **PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motions
15 shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local
16 Bankruptcy Rules for the Northern District of California, shall be filed with the Bankruptcy
17 Court in accordance with the customary practices of the Bankruptcy Court, and shall be served
18 on (i) the Chambers of the Honorable Judge Dennis Montali, United States Bankruptcy Court for
19 the Northern District of California, 450 Golden Gate Ave, 16th Floor, Courtroom 17, San
20 Francisco, CA 94102; (ii) counsel for the Debtors, Weil, Gotshal & Manges, 767 Fifth Avenue,
21 New York, NY 10153-0119, Attn: Stephen Karotkin, Jessica Liou and Matthew Goren, and
22 Keller & Benvenuti LLP, 650 California Street, Suite 1900, San Francisco, CA 94108, Attn:
23 Tobias S. Keller, Jane Kim; (iii) the Office of the United States Trustee, 450 Golden Gate
24 Avenue, 5th Floor, Suite #05-0153, San Francisco, CA, 94102, Attn: James L. Snyder, Timothy
25 Laffredi; (iv) counsel for the Official Committee of Unsecured Creditors, Milbank, LLP, 55
26 Hudson Yards, New York, NY 10001-2163, Attn: Dennis F. Dunne and Samuel A. Khalil, and,
27 Milbank, LLP, 2029 Century Park East, 33rd Floor, Los Angeles, CA 90067, Attn: Paul S.

1 Aronzon, Gregory A. Bray, Thomas R. Kreller; (v) proposed counsel for Official Committee of
2 Tort Claimants, Baker & Hostetler, LLP, 11601 Wilshire Blvd., Suite 1400, Los Angeles, CA
3 90025-0509, Attn: Eric. E. Sagerman and Lauren T. Attard, and Baker & Hostetler, LLP, 1160
4 Battery Street, Suite 100, San Francisco, CA 94111, Attn: Robert A. Julian, Cecily A. Dumas;
5 (vi) counsel for esVolta, Hogan Lovells US LLP, Attn: Hampton Foushee
6 (hampton.foushee@hoganlovells.com), 875 Third Avenue, New York NY, 10022; and (vii) all
7 parties requesting notice in these chapter 11 cases pursuant to Rule 2002 of the Federal Rules of
8 Bankruptcy Procedure, so as to be so filed or received no later than **April 3, 2019, at 4:00 p.m.**
9 **(PST)** (the "Objection Deadline").

10 **PLEASE TAKE FURTHER NOTICE** that reply papers in further support of the
11 Motions must be filed and served no later than **12:00 p.m. (PST) on April 8, 2019.**

12 **PLEASE TAKE FURTHER NOTICE** that failure to properly file and serve an
13 opposition may be deemed consent to the relief requested in the Motions or a waiver of any
14 right to oppose it.

15 Dated: March 20, 2019

HOGAN LOVELLS US LLP

By: /s/ Erin N. Brady

Erin N. Brady (CA 215038)
erin.brady@hoganlovells.com
1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Telephone: (310) 785-4600
Facsimile: (310) 785-4601

– and –

M. Hampton Foushee (*pro hac vice*)
hampton.foushee@hoganlovells.com
875 Third Avenue
New York, New York 10022
Telephone: (212) 918-3000
Facsimile: (212) 918-3100

**COUNSEL FOR PARTY IN INTEREST
ESVOLTA, LP**